

Office of the Chapter 13 Standing Trustee

Isabel C. Balboa, Chapter 13 Standing Trustee[†]

*Jane L. McDonald, Counsel
Raymond H. Shockley, Jr., Staff Attorney
Jennifer R. Gorchow, Staff Attorney*

Jennie P. Archer
Kelleen E. Stanley*
Lu'Shell K. Alexander*
Certified Bankruptcy Assistant

[†]*Fellow, American College of Bankruptcy*

November 15, 2019

The Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

**RE: Chapter 13 Bankruptcy
Case No. 18-19074 (ABA)
Debtor(s) Name: Damiano M. Consilvio, Sr. and Danielle C. Consilvio**

Dear Judge Altenburg:

Please accept this letter in lieu of a more formal response to Debtor's Notice of Proposed Compromise or Settlement of Controversy which is returnable Tuesday, November 26, 2019, at 10:00 a.m.

Debtors have been awarded a gross settlement in the amount of \$50,000 with a net settlement of \$16,918.66 stemming from a personal injury lawsuit. Debtors claim personal injury proceeds up to \$23,675 as exempt pursuant to 11 U.S.C. § 522(d)(11)(D) on Amended Schedule C filed on October 22, 2019.

The Notice of Proposed Compromise or Settlement of Controversy states that there is a federal insurance lien of \$39,277.73 which was reduced to \$16,666.00. After Debtor's personal injury counsel receives one-third of the settlement, plus costs, Debtors will receive \$16,415.34. Debtors failed to attach a Settlement Sheet as an exhibit to the Notice; therefore, the Trustee cannot verify the validity of the settlement.

Based on the foregoing, the Trustee respectfully requests Debtors be required to provide the Court with a copy of the Settlement Sheet so that the terms of the settlement may be reviewed.

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully submitted,

/s/Jennifer R. Gorchow
Jennifer R. Gorchow
Staff Attorney

JRG/jpa
cc: Rex J. Roldan, Esquire (Via CM/ECF)
Damiano and Danielle Consilvio (Via regular mail)